

Lisa R. Petersen (7598)
Brenda E. Weinberg (16187)
Amy L. Herrington (18695)
COHNE KINGHORN, P.C.
111 East Broadway, 11th Floor
Salt Lake City, Utah 84111
Telephone: (801) 363-4300
Facsimile: (801) 363-4378
Email: lpetersen@ck.law
aherrington@ck.law

Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, SOUTHERN REGION**

REBECCA BROADBENT, JARED
RASBAND, AND HAZEL SAINSBURY,

Plaintiffs,

v.

RICHARD “BIFF” WILLIAMS, JORDON
SHARP, DEL BEATTY, MICHAEL
LACOURSE, HENRIE WALTON,
TIFFANY WILSON, UTAH TECH
UNIVERSITY, GEOFF LANDWARD,
UTAH BOARD OF HIGHER EDUCATION,
UTAH SYSTEM OF HIGHER
EDUCATION, THE OFFICE OF THE
COMMISSIONER OF HIGHER
EDUCATION, ALISON ADAMS, ERIC
PEDERSEN, MATT BLACK, JYL HALL,
JARED MADSEN, STACY SCHMIDT,
BROOKE ULRICH, TRAVIS
ROSENBERG, KYLE WELLS, and
COURTNEY WHITE, and

JOHN AND JANE DOES I-X

Defendants.

**PLAINTIFFS’ MOTION FOR LEAVE TO
FILE OVERLENGTH REPLY
MEMORANDUM IN SUPPORT OF
MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

Civil No. 4:24-cv-00091-DN-PK

Judge: David Nuffer
Magistrate Judge: Paul Kohler

Pursuant to DUCivR 7-1(a)(7)(A), Plaintiffs Rebecca Broadbent, Jared Rasband, and Hazel Sainsbury (“Plaintiffs”), by and through counsel, hereby submit this Motion for Leave to File an Overlength Reply Memorandum in Support of Motion for Leave to File Second Amended Complaint (“Reply”) for good cause.

RELIEF REQUESTED AND SUPPORTING GROUNDS

Plaintiffs seek leave to file an overlength reply memorandum in support of their motion up to twenty (20) pages or 7,000 words, excluding caption, table of contents, table of authorities, signature block, and certificate of service, which exceeds the page limit set forth in DUCivR 7-1(a)(4)(D)(i) by ten (10) pages or 3,900 words.

The Court will approve such requests only for good cause and a showing of exceptional circumstances that justify the need for an extension of the specified page limitations. Good cause exists here. In response to Plaintiffs’ Motion for Leave to File Second Amended Complaint (the “Motion to Amend”), Defendants filed three separate memorandums in opposition:

- On June 20, 2025, Defendants Utah State Board of Higher Education (“UBHE”) and Commissioner Geoffrey Landward (“Landward”) filed their *Opposition to Plaintiffs’ Motion to File Second Amended Complaint*;
- On June 20, 2025, Defendants Richard “Biff” Williams (“Williams”), Michael Lacourse (“Lacourse”), and Eric Pedersen (“Pedersen”) filed their *Memorandum in Opposition to Plaintiff’s Motion for Leave to File Second Amended Complaint*; and
- On July 7, 2025, Defendants Utah Tech University (“Utah Tech”), Jared Madsen (“Madsen”), Jyl Hall (“Hall”), Stacy Schmidt (“Schmidt”), Brooke Ulrich (“Ulrich”), Courtney White (“White”), Travis Rosenberg (“Rosenberg”), and Shane

Smeed (“Smeed”) filed their *Opposition to Plaintiffs’ Motion to Amend Their First Amended Complaint*.

See Docket Nos. 184, 185, and 194, respectively (collectively, the “Oppositions”).

For judicial efficiency and to streamline the litigation process by addressing several related issues in one document, rather than filing separate responses to each of the Oppositions, Plaintiffs address all arguments raised in the three Oppositions in a single omnibus Reply. Accordingly, Plaintiffs’ seek the Court’s order authorizing the Plaintiffs’ request for additional pages in order to address all arguments raised in three separate Oppositions in one single omnibus Reply.

AUTHORITY FOR ACTING WITHOUT AWAITING RESPONSE

Pursuant to Fed. R. Civ. P. 27(b), the Court may act on this motion without waiting for a response, and therefore this motion is fully briefed and ready for decision. No hearing has been requested. A proposed order is filed concurrently herewith.

CONCLUSION

Based upon the foregoing, Plaintiffs respectfully request that they be granted leave to file an overlength Reply.

DATED: July 18, 2025.

COHNE KINGHORN, P.C.

/s/ Lisa R. Petersen

Lisa R. Petersen

Brenda E. Weinberg

Amy L. Herrington

Attorneys for Plaintiffs